

IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

BOBBY D. FENTRESS, and all other individuals similarly situated,

§

Plaintiff,

Case No. 4:16-cv-03484

V.

EXXON MOBIL CORPORATION,  
SUZANNE McCARRON, and  
MALCOLM FARRANT,

## Defendants.

§  
§

## **STIPULATION AND PROPOSED ORDER**

WHEREAS, by Order entered on December 21, 2016 (the “December 21 Order”), the Court authorized Bobby D. Fentress (“Plaintiff”) to serve and file his amended complaint within 30 days of the entry of the December 21 Order (i.e., by January 20, 2017), and for Exxon Mobil Corporation (“ExxonMobil”), Suzanne McCarron and Malcolm Farrant (collectively, the “Individual Defendants,” and, with ExxonMobil, “Defendants”) to move, answer, or otherwise respond to the amended complaint within 60 days after the amended complaint is filed and served (i.e., by March 21, 2017). (See Dkt. No. 20 at ¶¶ 4-5.);

WHEREAS, if Defendants file a motion to dismiss the amended complaint, the Court further authorized Plaintiff to respond to that motion within 60 days (i.e., by May 22, 2017), and Defendants to reply within 30 days (i.e., by June 21, 2017). (*See* Dkt. No. 20 at ¶ 5.);

WHEREAS, there have been no previous requests for an extension of the deadlines set forth in the December 21 Order; and

WHEREAS, due to unforeseen difficulties in securing additional class representatives, Plaintiff has requested, and Defendants have agreed, subject to the approval of the Court, to extend the deadlines entered by the Court on December 21, 2016:

IT IS HEREBY STIPULATED AND AGREED, by and between the attorneys for Plaintiff and the attorneys for Defendants, as follows:

1. Plaintiff shall file and serve an amended complaint no later than February 3, 2017.
2. Defendants shall move, answer, or otherwise respond to the amended complaint no later than April 4, 2017.
3. If Defendants file a motion to dismiss the amended complaint, Plaintiff shall respond to that motion no later than June 5, 2017, and Defendants shall file their reply brief(s) no later than July 5, 2017.

Dated: January 16, 2017

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*Local Counsel for Plaintiff Bobby D. Fentress*

Dated: January 16, 2017

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Dated: January 16, 2017

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*Counsel for Defendants Exxon Mobil Corporation, Suzanne McCarron, and Malcolm Farrant*

SO ORDERED:

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Dated

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UNITED STATES DISTRICT JUDGE